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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA, )**

**Plaintiff, )**

**v. )**

**ROBERT RADIN, )**

**Defendant. )**

**Case No. 2:13-cr-0118-JCM-(CWH)**

**STIPULATION TO CONTINUE SENTENCING HEARING**

**(First Request)**

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to extend the time for the sentencing hearing in this case to a date no earlier than April 18, 2016. Currently, sentencing is scheduled for March 7, 2016. This is the parties' first request for a stipulation for the purpose identified herein.

In support of this stipulation, the parties rely upon the following:

1. The government filed an Information (Pacer #101) in this case on December 9, 2015. Mr. Radin plead guilty to the one-count Information and the Court accepted his plea, setting his sentencing for March 7, 2016.

2. Counsel for Defendant has advised government counsel that, due to his work

1 schedule and the fact that Mr. Radin resides out-of-state, additional time is needed to prepare for  
2 the sentencing. Specifically, during the next six weeks, undersigned counsel for Defendant will  
3 be exceedingly busy preparing for and taking 20 separate depositions in three separate civil cases.

4 3. Mr. Radin, who is out of custody, does not object to this stipulation seeking a  
5 continuance of his sentencing date.

6 4. Given the significant liberty interests at stake, the parties are in agreement that  
7 defense counsel should have sufficient time to prepare for the sentencing. A continuance of  
8 approximately six weeks will provide counsel with sufficient time to prepare for sentencing in  
9 this matter.

10 Respectfully submitted,

11 /s/ J. Gregory Damm

/s/ Paul S. Padda

12 J. Gregory Damm, Esq.  
Assistant United States Attorney

Paul S. Padda, Esq.  
The Federal Defenders Law Group

13 Attorney for the United States

Attorney for Defendant

14 Dated: January 19, 2016

Dated: January 19, 2016

16 **IT IS SO ORDERED:**

17 **The parties' stipulation seeking a continuance of**  
18 **the sentencing hearing in United States v. Robert**  
19 **Radin, 2:13-cr-0118-JCM-CWH is hereby**  
**approved. Sentencing shall be continued to the**  
**date and time set forth below:**

20 **Date: April 20, 2016**

21 **Time: 10:00 a.m.**

22   
23 **UNITED STATES DISTRICT JUDGE**

24 **Dated: January 20, 2016**

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on January 19, 2016 a copy of the foregoing document, "STIPULATION TO CONTINUE SENTENCING HEARING" was served (via the Court's CM/ECF system) upon counsel of record for the United States.

*/s/ Paul S. Padda*

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Paul S. Padda, Esq.